

THE PARK LAW GROUP, LLC

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EASYTEX CORPORATION LIMITED,

Plaintiff,

v.

PETER & FRANK OF NY, CORP., CHUL KYU
KIM a/k/a KIM CHUL KYU a/k/a CHUK CHUL
KIM a/k/a ROBERT CHUL KIM a/k/a CHUL
KYOON KIM a/k/a CHULKYOO KIM a/k/a KIM
K. CHUL, BARO SHIPPING CO., LTD., TOP
TEN TRANS, INC., GFA, INC., 3 WIN INC.,
MERCURY, AMERICAN INTERNATIONAL
LINE, INC., SOON CHAN HONG a/k/a SOON
C. HONG a/k/a SOONCHAN C. HONG a/k/a
SOON CHAN HONG a/k/a CHAN S. HONG
a/k/a HONG S. CHAN a/k/a HONG SOON
CHANG d/b/a SOONCHAN HONG CUSTOM
HOUSE BROKER, STOP & STOR, jointly and
severally,

Defendants.

Civil Action No. 07-CV-03907 (BSJ) (JCF)

ECF CASE

**CERTIFICATE OF HYUN SUK CHOI,
ESQ. IN SUPPORT OF PLAINTIFF'S
APPLICATION FOR CLERK'S
CERTIFICATE OF DEFAULT
AGAINST DEFENDANT PETER &
FRANK OF NY, CORP.**

Hyun Suk Choi hereby certifies that:

1. I am a member of the Bar of this Court and am associated with The Park Law Group, LLC, attorneys for Plaintiff Easytex Corporation Limited ("Plaintiff") in this action.
2. I am familiar with all the facts and circumstances in this action.
3. I make this Certificate pursuant to Rule 55(a) of Federal Rules of Civil Procedure and Rule 55.1 of the Local Civil Rules for the Southern District of New York, in support of Plaintiff's

application for Clerk's Certificate of Default against Defendant Peter & Frank of NY, Corp. ("Defendant").

4. On May 18, 2007, Plaintiff commenced this action by filing a summons and complaint against numerous defendants in this action.

5. On June 29, 2007, Defendant filed an Answer and Counterclaim ("Answer").

6. On January 11, 2008, counsel for Defendant filed a Motion to Withdraw as Attorney with the Court ("the Motion").

7. On January 22, 2008, the Court granted the Motion. A true and correct copy of the Order concerning the Motion ("the Order") is attached as Exhibit A.

8. In the Order, the Court ordered Defendant to appear by new counsel by February 22, 2008. See id.


9. Defendant has failed to comply with the Order to date.

10. The Order further states that Defendant's failure to comply with the Order will result in entry of judgment by default against Defendant. See id.

11. A proposed form of Clerk's Certificate of Default against Defendant is attached as Exhibit B.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 21, 2008



Hyun Suk Choi, Esq. (HC4208)
Attorney for Plaintiff
Easytex Corporation Limited